

Cause No. 2022-01744**MIRTHA GUTIERREZ Individually
and o/b/o RENBERTO GUTIERREZ,***Plaintiff,*

v.

JULES P. CREWS,*Defendant.*§
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§**IN THE DISTRICT COURT OF****HARRIS COUNTY, TEXAS****281ST JUDICIAL DISTRICT****DEFENDANT JULES P. CREWS'S ORIGINAL ANSWER**

COMES NOW, Jules P. Crews (hereinafter "Defendant" or "Crews"), and files this his Original Answer, and would show unto the Court as follows:

GENERAL DENIAL

1. Defendant does hereby exercise his right under the law wherein Defendant may file a general denial and require the Plaintiff to prove Plaintiff's causes of action by a preponderance of the evidence. Defendant, therefore, denies each and every, all and singular, the allegations contained in Plaintiff's Original Petition for the sole purpose of requiring the Plaintiff to prove Plaintiff's cause of action to a fair and impartial jury.

WHEREFORE, PREMISES CONSIDERED, Defendant Jules P. Crews respectfully prays that upon final judgement entered herein, Plaintiff recover nothing against Defendant, that Defendant have judgment in his favor, that all costs be taxed against Plaintiff, and for such other and further relief, at law or in equity, to which Defendant is justly entitled.

Respectfully submitted,

MULLIN HOARD & BROWN, L.L.P.
Chad L. Farrar, SBN 00793716
C. Brett Stecklein, SBN 00794688
Katie Harrison, SBN 24062767
2515 McKinney Avenue, Suite 900
Dallas, Texas 75201
Telephone: (214) 754-0040
Facsimile: (214) 754-0043
cfarrar@mhba.com
bstecklein@mhba.com
kharrison@mhba.com

_____/s/ Chad L. Farrar

By: Chad L. Farrar

Attorney for Defendant Jules P. Crews

CERTIFICATE OF SERVICE

This is to certify that I have served a true and correct copy of the foregoing document upon all known counsel of record, as indicated below, in conformity to the TEXAS RULES OF CIVIL PROCEDURE on this 4th day of February, 2022.

Via e-filing

Via Email tbuzbee@txattorneys.com

cleavitt@txattorneys.com

Anthony G. Buzbee
Christopher J. Leavitt
THE BUZBEE LAW FIRM
JPMorgan Chase Tower
600 Travis Street, Suite 7300
Houston, Texas 77002

_____/s/ Chad L. Farrar

Chad L. Farrar

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LaKisha Pringle on behalf of Chad Farrar
Bar No. 00793716
kpringle@mhba.com
Envelope ID: 61456758
Status as of 2/4/2022 1:04 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Brett Stecklein		bstecklein@mhba.com	2/4/2022 12:48:38 PM	SENT
Katie Harrison		kharrison@mhba.com	2/4/2022 12:48:38 PM	SENT
Chad Farrar		cfarrar@mhba.com	2/4/2022 12:48:38 PM	SENT
Kisha Pringle		kpringle@mhba.com	2/4/2022 12:48:38 PM	SENT